

Human Service Funders

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RESPONSE TO

OFFICE OF MANAGEMENT AND BUDGET

STUDY OF FEDERAL ASSISTANCE PROGRAMS

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INTRODUCTION

The Human Service Funders Roundtable, an organization of eight major human service funders in Sacramento County, was formed because each of the members was concerned about the lack of coordination in human service funding.

One of the early priorities of the Roundtable was to inform Federal Funding sources of the problems facing local participants in Federal Assistance Programs and of the uncoordinated and confusing nature of the Federal Assistance System. This paper is the Human Service Funders Roundtable presentation of these problems and is a submittal to the Office of Management and Budget Study of Federal Assistance Programs.

The paper responds to three specific areas of the OMB Study:

- * Task E Equity, fairness, and competition in assistance transactions.
- * Task G Recipient-related issues.
- * Task I Environment of Federal Assistance.

These tasks were chosen for response because the Roundtable felt they were the task areas which impacted local participation in Federal assistance to a significant degree. This should not be interpreted that the other task areas do not impact local participation, just that the areas chosen were considered to be the most significant.

Another point which shold be kept in mind is that the Roundtable feels that the issue over categorical vs. block grant funding is irresolvable, since there are clear reasons for each process. The Roundtable does, however, see a need for greater flexibility at the local level and does not feel that this increased flexibility would compromise the intent of categorical programs, but could actually make them more responsive to local needs.

TASK E: EQUITY, FAIRNESS, AND COMPETITION IN ASSISTANCE TRANSACTIONS

1. Public notification of grant programs, fund availability, and intent to fund:

PROBLEMS

- a. The use of the Federal Register is not an adequate method for notification of federal assistance availability. The Federal Register is difficult to use, is not always easy to obtain, is lengthy, and is difficult to read. Use of the Federal Register puts small communities at a disadvantage.
- b. There is no available source of information concerning grants and awards which are made to a community for any given time period. It is difficult, if not impossible, to determine total dollar amounts or grant programs operating.

RECOMMENDATIONS

- a. OMB should publish and widely distribute, a simple and concise listing of fund availability, grant awards, and proposal deadlines. This publication should be prepared on a pre-determined schedule and distributed in a timely basis.
- b. Each federal agency should establish an ombudsman to assist in providing information concerning assistance programs and the status of pending applications.
- c. Each federal agency should provide information on funding decisions and actions on Clearinghouse comments, in relationship to grants awarded, to the appropriate OMB A-95 Clearinghouse.
- d. Each federal agency providing assistance should improve its identification and explanation of fundable activities within each assistance program, provide clear direction as to fundable activities, indicate preferable applicants, provide examples of prior criteria used for selection, and provide examples of previously funded projects.
- e. Federal agencies should explore a more extensive use of a "Concept Paper" approach to the initial screening of applicants for financial assistance, and should provide proof of applicant agency capability, prior history of involvement in the program activity, and past successes in program operation.

2. Purpose of competition for assistance:

PROBLEMS

- a. Competition should weed out poor programs and ineffective agencies; however, it also opens the door to poor programs which have effective lobbying, political pressure or grant writing skills.

- b. Competition gives the illusion of equality, leads to more generalized proposals, and often wastes a considerable amount of time and energy of applicant agencies who stand little or no chance of receiving assistance.
- c. The current competition process encourages personal lobbying and grantsmanship, which places areas such as the West at a disadvantage due to distance and cost of travel.

RECOMMENDATIONS

- a. Federal agencies should be more honest with potential applicants concerning their chances of success. They should also make public, prior or tentative funding commitments of funds allegedly available for open competition.
- b. In appropriate areas where programmatic specifics of jurisdictional determinations have determined that contracting or bidding are appropriate methods of providing assistance, these methods should be used for specific products or purposes.
- c. There should be an appeal procedure for applicants not funded, or prior notification that no appeals will be accepted. There should be a finding of fact as to why proposals are not accepted.

3. Equity and fairness related to recipient selection:

PROBLEMS

- a. RFP's and grant program announcements do not always equally provide adequate and accurate information to all potential applicants.
- b. Past experience is not always considered when program agencies make assistance decisions. Lobbying and political pressure often influence decisions, even though these activities may be inconsistent with the concept of open competition.

RECOMMENDATIONS

- a. RFP's and grant program announcements should provide more complete information and guidance to all potential applicants in an equitable fashion.
- b. Past experience should be a key factor in making assistance decisions and lobbying should play a limited role in decision-making.
- c. Unsuccessful applicants should be informed, in detail, of the reasons they were not selected.

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TASK G: RECIPIENT-RELATED ISSUES

1. Relationship of federal programs and state/local programs:

PROBLEMS

- a. The federal fiscal year is out of phase with most state/local fiscal year and it is a common practice to begin programs and fund programs whenever federal agencies start new programs.
- b. Contract and program years for federal assistance are determined by each agency and do not follow any logical pattern.

RECOMMENDATIONS

- a. Contract and program years should be made uniform, at least for major federal assistance programs. If circumstances require a program start date different than the uniform date, programs should only be funded until the next end date and then be moved to the uniform program year.
- b. Multi-year program planning should be allowed and encouraged to the fullest extent possible allowed by the legislation authorizing the program.

2. Local participation in federal assistance programs:

PROBLEMS

- a. Federal assistance programs are a hodge podge of regulations, eligibility requirements, minimum income levels, policies, forms, formats, and timing. They are uncoordinated often work at cross purposes, hinder long term planning and budgeting, force applicant agencies to spend countless hours filling out application forms, provide little help in designing programs, and provide only minimal help in implementation.
- b. There is no separate and distinct source of financial assistance for human service program planning, these planning activities must compete for scarce service funds.

RECOMMENDATIONS

- a. Standardization of regulations, eligibility, policies, forms, formats, and timing should be explored.
- b. Financial assistance for program planning should be offered to finalists competing for assistance programs, grants and awards, and federal assistance programs should recognize and reimburse successful applicants for pre-award expenses.
- c. A planning grant program patterned after HUD 701, for Human Services should be developed and implemented. Planning grants should be available for periods of 3,6,9, or 12 months.

3. Local coordination of program planning and operation:

PROBLEMS

- a. There are no federal incentives to coordinate at the local level, and the various federal assistance programs and their representatives provide no example of coordination at the regional level.
- b. Federal agencies and their regional offices do not coordinate their program activities or funding decisions at the national or regional level.
- c. The OMB A-95 system is not an effective coordination device because many federal agencies do not adhere to the guidelines and often make funding decisions in direct opposition to local comments, seldom provide funding information to clearinghouse, and increasingly exempt programs from the A-95 process.

RECOMMENDATIONS

- a. The various federal assistance programs should develop and use a common application form, should develop uniform funding timetables and announcements, should provide incentives to program coordination, should require agencies receiving assistance to "buy-in" to local coordination efforts and should develop regional coordination mechanism in order that regional representatives coordinate activities.
- b. The use of Joint Funding Application (JFA) should be expanded.
- c. The OMB A-95 process should be strengthened by requiring federal agencies to adhere to the A-95 guidelines and more feed back should be sent back to local clearinghouse.
- d. Federal support should be given for program data collection, analysis, and feed back to local jurisdictions and local programs.
- e. More reliance should be placed upon local coordination efforts.

4. Management capacity of local recipients:

PROBLEMS

- a. Small rural areas are often at a disadvantage when competing for assistance and there is usually no technical assistance from the federal funding agency.
- b. Program monitoring by federal agencies is lax and technical assistance is most often unavailable.
- c. National contracts and non-profit regional centers for technical assistance are often costly programs which provide ineffective and untimely assistance often on a narrow basis and on a "take it or leave it basis".

RECOMMENDATIONS

- a. More high quality, program specific technical assistance should be provided either by direct source or contract, to smaller jurisdictions that are applying for federal assistance. Successful program operators should be considered when technical assistance contracts are awarded.
 - b. Program monitoring of federal assistance programs should be improved and strengthened.
5. Equity and fairness issues related to program beneficiaries:

NOTE: Program beneficiaries has been defined as the ultimate recipient of the service, not the entity which receives the grant or contract.

PROBLEMS

- a. Not all assistance programs have meaningful citizen participation requirements in program planning and operation.
- b. There is little technical or fiscal assistance available to applicants for program planning and development.
- c. Effective citizen participation is often burdened by excessive and unnecessarily complex representative character or avoid requirements which often extend beyond economic, ethnic, age, and sex criteria.

RECOMMENDATIONS

- a. Citizen participation requirements for program planning and operation should be extended into more assistance programs.
- b. A "client satisfaction" process should be explored in order to determine if assistance programs are actually meeting client needs.
- c. Federal agencies should avoid mandatory specific citizen participation techniques and eliminate overly complex and specific representation character or quota requirements.

TASK I: ENVIRONMENT OF FEDERAL ASSISTANCE

1. Development of federal assistance programs:

PROBLEMS

- a. Federal assistance programs often are developed from unsubstantiated and incomplete data, and with little or no local input.
- b. Federal assistance programs have been developed on a legislative and departmental piecement approach. There is no planned or consistent method of program development among federal agencies.

RECOMMENDATIONS

- a. More local input should be sought by federal agencies before implementing new programs.
- b. Local advisory groups should be asked to comment on proposed new programs before implementation.
- c. There is a need to develop a network of state, regional, county, city and private groups and agencies in each federal region to regularly assist in program development. This involvement should occur at a policy study phase and not just review of proposed regulations.

2. Variations in perceptions, goals, objectives and needs:

PROBLEMS

- a. Responsibilities for policy determination, program guidelines, operating procedures and program administration is fragmented and confusing.
- b. There is no standardization of needs analysis, priority setting, goal setting, objective determination, program guidelines, or operating procedures among federal agencies and programs.
- c. There is little long term planning for continuation of programs once federal funding ends. Too many different departments start demonstration projects without consideration for the competition created at the local level.

RECOMMENDATIONS

- a. Development of program policy, program guidelines, and operating procedures should be more closely coordinated with and among federal agencies and state, regional, county, city, and private agencies.
- b. Needs analysis, goal setting, and objective determination procedures should be more consistent among federal programs.

- c. More emphasis should be given to ongoing federal funding of successful demonstration projects.

3. Program scope:

PROBLEMS

- a. Categorical programs limit local flexibility to meet the most pressing needs and results in applicants "going after the bucks" rather than addressing priority needs.
- b. Categorical programs are often better funded than broader, more flexible programs.
- c. Programs suffer from frequent changes in allowable activities.
- d. There is little long range planning at the federal level and there are only limited time and resources available at the local level prior to implementation.
- e. Block grant programs are becoming increasingly categorical in nature, with increased restrictions on utilization of resources.

RECOMMENDATIONS

- a. More local flexibility in program design should be allowed and multi-year planning and funding should be instituted.
- b. Long range planning, coordinated with other federal programs, should be required in each assistance program.
- c. Program changes should be limited in number and scope, and prior to implementation should be required to be tested through a "program impact statement" process which involves the network of state and local agencies cited earlier.
- d. Assistance programs should be designed with broad mandates and guidelines and local agencies should be allowed to work within these guidelines to meet local needs.

4. Program audits and exception resolutions:

PROBLEMS

- a. Program financial audits are not timely, are not related to program operation evaluation, and the exception resolution process is time consuming.
- b. There is no standard audit procedure and little or no, coordination between federal and state agencies in auditing activities.

RECOMMENDATIONS

- a. Audits should be done annually on a timely basis, should be coordinated among various assistance programs so that a single complete audit is done and accepted by all funding and pass-thru agencies,

and should be related to program operation evaluation.

- b. Timely audits and exception resolution should be based upon a "statute of limitations" which would set a definite period for audits, after which no audit would be done.

HUMAN SERVICE FUNDERS ROUNDTABLE

SACRAMENTO COUNTY

* Emil DeJan County Health Agency
* Dick Wolgamott County Executive Office

SACRAMENTO EMPLOYMENT TRAINING AGENCY

* Gary Wilkening Executive Director

SACRAMENTO AREA ECONOMIC OPPORTUNITY COUNCIL

* Larry Stenzel Deputy Director

AREA 4 AGENCY ON AGING/COMMUNITY SERVICES PLANNING COUNCIL

* James E. Mills Executive Director

REGION D CRIMINAL JUSTICE AND JUVENILE DELINQUENCY

* Karen Rosa Executive Director

UNITED WAY OF SACRAMENTO

* Phil Parsons Associate Director

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